

## State Water Resources Control Board

March 2, 2016

Mr. Dok Choe  
ExxonMobil Environmental Services Company  
12851 166<sup>th</sup> Street  
Cerritos, CA 90703  
([dok.choe@exxonmobil.com](mailto:dok.choe@exxonmobil.com))

Dear Mr. Choe:

CLOSURE DENIAL REVIEW FOR PETROLEUM UNDERGROUND STORAGE TANK CASE,  
HUMBLE OIL STATION 7-8869, 1440 BROADWAY, SANTA ANA, ORANGE COUNTY

State Water Resources Control Board (State Water Board) Resolution No. 2012-0062 requires that State Water Board staff review a lead agency's decision when the lead agency has denied a request by a responsible party for an underground storage tank (UST) case closure pursuant to the Low-Threat UST Case Closure Policy (Policy).

The subject case has the following identification numbers:

- State Water Board, GeoTracker No. T0605994076
- Santa Ana Regional Water Quality Control Board (Santa Ana Water Board), Case No. 083004046T

State Water Board staff reviewed the closure request dated November 4, 2015 and the response from the Santa Ana Water Board dated December 31, 2015. After careful consideration of the GeoTracker record, State Water Board staff agrees with the Santa Ana Water Board staff determination that all of the Policy criteria have not been met. Based on information in the above-referenced GeoTracker record, State Water Board staff finds that the subject case does not meet the following Policy criteria:

- **General Criterion f.** – Secondary source has been removed to the extent practicable.
- **Petroleum Vapor Intrusion to Indoor Air Criteria**

A soil vapor extraction (SVE) high-intensity targeted event was conducted at the site in October 2014. The hydrocarbon removal rate during the SVE event was 22.4 pounds per day and the concentration of benzene in the final influent was 12,000 parts per billion by volume. This indicates significant secondary source remains beneath the site. Additionally, the site does not meet vapor intrusion to indoor air criteria specified in the Policy due to remaining concentrations in soil and groundwater and the lack of a sufficient bioattenuation zone.

Contaminants remaining at the subject site continue to pose a potential threat to human health, safety, and the environment. Criteria for low-threat UST case closure have not been met at this time, therefore closure of the UST case is not appropriate.

If you have any questions, please contact Mr. George Lockwood at (916) 341-5752 or [George.Lockwood@waterboards.ca.gov](mailto:George.Lockwood@waterboards.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads "Karen Larsen". The signature is fluid and cursive, with the first name "Karen" and last name "Larsen" clearly distinguishable.

Karen Larsen, Deputy Director  
Division of Water Quality

cc: [Via email only]

Mr. Kurt Berchtold, Executive Officer  
Santa Ana Water Board  
([Kurt.Berchtold@waterboards.ca.gov](mailto:Kurt.Berchtold@waterboards.ca.gov))

Mr. Michael Adackapara  
Santa Ana Water Board  
([Michael.Adackapara@waterboards.ca.gov](mailto:Michael.Adackapara@waterboards.ca.gov))

Mr. Ken Williams  
Santa Ana Water Board  
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Ms. Rose Scott  
Santa Ana Water Board  
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Mr. David Rice  
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([David.Rice@waterboards.ca.gov](mailto:David.Rice@waterboards.ca.gov))

Ms. Therese Barakatt  
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Mr. George Lockwood  
State Water Board  
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cc: Continued next page

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